

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN  
GREEN BAY DIVISION

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UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 19-CR-201

MASON BEAUDRY,

Defendant.

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**MOTION TO ADJOURN SENTENCING**

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Mason Beaudry, by counsel, hereby requests that the Court adjourn the sentencing hearing scheduled for Monday, April 27, 2020, based on the COVID-19 pandemic [Pandemic]. Further, counsel submits the following:

1. On January 30, 2020, Beaudry pled guilty to one count of felon in possession of a firearm in violation of 18 U.S.C. § 922(g). Dkt. No. 10. Sentencing was set for April 27, 2020.
2. Beaudry was released on a signature bond and to date, has been fully compliant with his conditions of release.
3. For a variety of reasons including counsel and client both being sick at different times, the Pre-Sentence Investigation Interview kept being postponed. Then the COVID-19 pandemic arrived and all interviews are being done through

phone or video or through written questions. Beaudry's PSR is in the process of being completed through the use of all of the above but at this time, the parties still do not have a completed PSR.

4. For these reasons, counsel is requesting the sentencing scheduled for Monday, April 27, 2020, be adjourned for approximately 60 days. If able to be moved up, counsel suggests the parties can and will contact the court to accommodate an earlier date.

5. Counsel communicated with Assistant United States Attorney Daniel Humble and he has no objection to this request.

THEREFORE, on the above grounds, Mason Beaudry respectfully requests that the court adjourn his sentencing hearing currently scheduled for Monday, April 27, 2020, for approximately 60 days.

Dated at Green Bay, Wisconsin, this 23rd day of April, 2020.

Respectfully submitted,

**s/ Krista Halla-Valdes**

Krista Halla-Valdes, FL Bar #073369

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